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January 17, 2025

**By ECF**

Honorable Colleen McMahon  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Yehudiel v. City of New York, et al.  
24 Civ. 8519 (CM)

Your Honor:

Extension granted.  
Conference adjourned to  
3/27/2025 at 10:30 am.

*Colleen McMahon*  
2/28/2025

I represent defendants the City of New York and Louis A. Molina in the above-referenced matter. Defendants City and Molina write to respectfully request that the Court: (1) grant them a thirty-day extension of time to respond to the Complaint, from February 1, 2025, to March 3, 2025, and *sua sponte* extend the other defendants' deadlines to respond to the Complaint to the same date; and (2) adjourn the initial conference to a date after March 3, 2025. This is defendants City and Molina's second request for an extension of time to respond to the Complaint and first request for an adjournment of the initial conference. Plaintiff consents to a final extension of time for defendants to respond to the Complaint and defendants' adjournment request.

By way of background, plaintiff filed the Complaint on November 8, 2024, alleging various claims pursuant to § 1983 against the City, defendant Molina, and four other individual defendants (ECF No. 1). On November 14, 2024, the Court scheduled the initial conference for January 23, 2025, at 11:00 a.m., and also ordered that the initial conference would be automatically canceled if the parties submitted a case management plan at least two days prior to the initial conference (ECF No. 12). On November 27, 2024, the City requested an extension of time to respond to the Complaint, from December 3, 2024, to February 1, 2025, and a corresponding *sua sponte* extension of time for the other defendants' to respond to the Complaint to the same date (ECF No. 23). The bases for the City's request were that this Office had not yet received pertinent documents from the New York City Department of Correction ("DOC") and appropriate medical releases from plaintiff, and that this Office needed time to assess representation of the individual defendants (Id.). The Court granted the City's request on December 2, 2024 (ECF No. 24).

Defendants City and Molina respectfully request that the Court grant them an additional thirty-day extension of time to respond to the Complaint, from February 1, 2025, to March 3, 2025.

and *sua sponte* grant the other defendants a corresponding extension of time to respond to the Complaint to the same date. This extension is sought for substantially the same reasons as those set forth the City's first extension request. That is, plaintiff provided pertinent medical releases only last week and, despite this Office's diligent efforts, it has only begun receiving pertinent documents from DOC this week. Further, because such documents are relevant to this Office's representation decision, it has not yet assumed representation of the individual defendants (aside from defendant Molina). Accordingly, defendants City and Molina respectfully request a second, thirty-day extension of time to respond to the Complaint to afford this Office time to properly investigate plaintiff's allegations in light of the outstanding documents and to assess and assume representation of the other individual defendants.

Furthermore, because this Office has not yet assumed representation of the individual defendants other than defendant Molina, it cannot agree to and file a proposed case management plan on their behalf (although counsel for the currently-represented parties have agreed to make good faith efforts to do so once this Office assumes representation of the rest of the defendants). As such, defendants City and Molina respectfully request that the Court adjourn the initial conference currently scheduled for January 23, 2025, at 11:00 a.m., to a date after March 3, 2025, to afford counsel time to agree to a case management plan on behalf of all parties. The requested extension will also allow for a more comprehensive discussion of the issues in this case in the event the initial conference is held.

Accordingly, defendants City and Molina respectfully request that the Court: (1) grant them a thirty-day extension of time to respond to the Complaint, from February 1, 2025, to March 3, 2025, and *sua sponte* extend the other defendants' deadlines to respond to the Complaint to the same date; and (2) adjourn the initial conference to a date after March 3, 2025.

Thank you for your time and consideration.

Respectfully submitted,

/s/ Zachary Kalmbach  
Zachary Kalmbach  
Senior Counsel

cc: Via ECF  
All counsel of record